

**TIMELINE FOR ACTIVITY
INTERNATIONAL AUTOMOTIVE COMPONENTS**

DATE	TYPE OF ACTIVITY	DESCRIPTION	DOCUMENTATION
6/7/99	Violation Notice	Violation Notice from David Morgan, MDEQ-AQD, to Lear Port Huron, for failing to submit a Michigan Rule 208(a) registration renewal limiting the facility PTE below major source thresholds. Rule 208(a) limits a major source PTE to minor source levels.	ATTACHMENT 3 - 1999 MDNRE Inspection Report
6/17/99	Response to Violation Notice	Letter from Chris Scott, Lear Port Huron, providing a demonstration that the PTE from the facility is not major and that the facility was choosing not to submit a Rule 208(a) registration renewal.	
8/3/99	Agency Inspection	David Morgan, MDEQ-AQD and Cyndi Mollenhour, MDEQ-AQD conduct inspection of Lear Port Huron facility to confirm that the facility no longer needed to submit a Michigan Rule 208(a) registration renewal. Inspection confirmed that PTE for source was below major source thresholds for VOCs and HAPs and Rule 208a registration was no longer required.	
5/4/05	Request to Void Permits	Letter from Dan Barr, Lear Port Huron, to Diane Kavanaugh-Vetort requesting MDEQ-AQD void permits for 2 Lear facilities in Port Huron. One facility is no longer owned by Lear; 1905 Beard Street facility has removed equipment and has equipment that is exempt from permitting under Michigan rules. PTE calculations for the 1905 Beard Street location were submitted with letter demonstrating that facility is exempt from permitting.	ATTACHMENT - 2 2005 MDNRE Inspection Report
5/13/05	Agency Meeting	Diane Kavanaugh-Vetort, MDEQ-AQD, met with representatives from Lear Port Huron to discuss general compliance, voiding permits to install and permit exemption requests.	
5/18/05	Response to Meeting	Letter from Dan Barr, Lear Port Huron, to Diane Kavanaugh-Vetort providing additional follow-up information requested in 5/13/10 meeting. Notes written on agency copy of letter indicate concurrence with exemption requests.	
4/1/07	change in ownership	Lear Port Huron facility changes ownership to International Automotive Components. No change to operations.	
3/10/10	Agency Inspection	Rebecca Loftus and Joyce Zhu, MDNRE, conduct compliance inspection of IAC Port Huron facility. MDNRE explained in closing meeting that they believed source to be operating without air permits and is potentially a major source based on their observations. Additional information requested with a deadline of 4/2/10.	ATTACHMENT - 1 2010 MDNRE Inspection Report
3/25/10	email	email from Gail Eschenberg, IAC Port Huron, to Rebecca Loftus, MDNRE, requesting extension to response deadline as corporate contact was out of country and unavailable to assist in response preparation.	
3/26/10	telephone communication	phone call from Gail Eschenberg, IAC Port Huron, to Rebecca Loftus, MDNRE, requesting extension to response deadline as corporate contact was out of country and unavailable to assist in response preparation.	
3/29/10	telephone communication	phone message from Rebecca Loftus, MDNRE to Gail Eschenberg, IAC Port Huron, denying request to extend deadline for response.	
4/1/10	email	email from Gail Eschenberg, IAC Port Huron, to Rebecca Loftus, MDNRE, providing additional information requested.	ATTACHMENT - 1A 2009 - 2010 Emissions Estimates (pre- 2010 method)
4/8-20/2010	email	email from Gail Eschenberg, IAC Port Huron, to Rebecca Loftus, MDNRE, providing supplemental additional information requested.	
5/13/10	Violation Notice	Violation Notice letter from Teresa Seidel, MDNRE, to IAC Port Huron alleging that the facility is a major source and in violation of state rules for failure to obtain a permit to install, a renewable operating permit and the Flexible Polyurethane Foam Production NESHAP. Letter demands submittal of a PTI application and ROP application within 60 days of the letter.	ATTACHMENT - 1B MDNRE Violation Notice
7/13/10	Response to Violation Notice	Letter from Gail Eschenberg, IAC Port Huron, to Teresa Seidel, MDNRE, responding to 5/13/20 MDNRE Violation Notice. PTE calculation submitted demonstrates that facility is not a major source of criteria pollutants or hazardous air pollutants. Conservative emissions calculations using industry emission guidelines indicate that for a few months in 2009 the emissions from the facility exceeded the state permit exemption criteria of 1000 lbs per month VOC and 20 lbs/month MDI.	ATTACHMENT - 1C Violation Notice Response Package

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7/29/10	conference call	conference call between MDNRE, IAC and FTCH to discuss 7/13/2010 submittal and review emission calculations with agency. Indicated in call that FTCH would have PTI application submitted by 8/20/10 provided authorization received from IAC.	
7/29/10	email	email from Rebecca Loftus, MDNRE, as follow-up to conference call requesting VOC and MDI emissions calculations for January - June 2010 with a response due by 8/16/2010.	
8/12/10	email	email from Gail Eschenberg, IAC Port Huron, to Rebecca Loftus, MDNRE, transmitting requested VOC and MDI emissions calculations for January - June 2010.	ATTACHMENT - 1D and 1E Process Emissions Recordkeeping 2010
8/19/10	email	Kay Bedenis, FTCH notified Rebecca Loftus via email that had received authorization to proceed with PTI application the previous day. Requested extension of PTI submittal deadline to 9/3/10.	
8/23/10	email	email from Rebecca Loftus, MDNRE, to Gail Eschenberg, IAC, indicating that PTI must be submitted to MDNRE and received by 9/3/2010.	
9/3/10	permit submittal	PTI application received by MDNRE for IAC Port Huron facility in response to 5/13/2010 violation notice.	ATTACHMENT - 1F PTI Application Package
9/7/10	Enforcement Notice	Letter from Richard Taszreak, MDNRE, to IAC requesting attendance at Enforcement Conference Meeting on 9/22/10 at MDNRE - Southeast Michigan District Office in Warren, Michigan.	ATTACHMENT - 1G MDNRE Enforcement Letter
9/10/10	telephone communication	Patrick Kresnak, IAC Corporate Staff, left voice mail message for Richard Taszreak, MDNRE, confirming IAC Corporate attendance at 9/22/10 Enforcement Conference Meeting.	
9/13/10	telephone communication	Gail Eschenberg, IAC Port Huron, spoke with Richard Taszreak, MDNRE, confirming plant attendance at 9/22/10 Enforcement Conference Meeting.	
9/22/10	meeting	Enforcement Conference Meeting held with representatives of MDNRE Lansing Enforcement staff, MDNRE District staff, IAC Port Huron and corporate staff and FTCH to discuss 9/7/10 MDNRE letter indicating escalated enforcement.	
9/22/10	email	email from Rebecca Loftus, MDNRE, to Kay Bedenis, FTCH, and Gail Eschenberg, IAC, requesting additional production rate and equipment information with reply deadline of 9/24/10.	
9/24/10	email	email response from Kay Bedenis, FTCH to Rebecca Loftus, MDNRE and Joyce Zhu, MDNRE, providing requested information.	
9/29/10	email	email from Rebecca Loftus, MDNRE, to Gail Eschenberg, IAC Port Huron, requesting alternate form of production rate information submitted by facility on 9/24/10.	
9/29/10	email	email from Kay Bedenis, FTCH, to Rebecca Loftus, MDNRE, indicating that requested production information had been submitted in a format that was available and that was one of the formats requested. Requested clarification of information request.	
9/29/10	email	email from Rebecca Loftus, MDNRE, to Kay Bedenis, FTCH, indicating Joyce Zhu, MDNRE, would call Kay Bedenis on 10/1/10 about request. They want to evaluate emissions using other methodology.	

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10/1/10	telephone communication	Kay Bedenis, FTCH, called Joyce Zhu, MDNRE, to explain the production information that had been submitted, that it met the criteria of the information request and explained that the information format requested was not reliable as it did not make sense with other production data. MDNRE concerned about evaporation during non-production time. Offered to re-do calculation using other production parameters. MDNRE indicated they would think about it and reply.	
10/4/10	telephone communication	telephone call from Richard Tazreak, MDNRE, to Patrick Kresnak, IAC Corporate Staff, indicating that information requested at 9/22/2010 Enforcement Conference had not been received by the MDNRE District Staff.	
10/4/10	email	email from Kay Bedenis, FTCH, to Richard Tazreak, MDNRE, forwarding copies of emailed communication with MDNRE District Staff that transmitted requested information on 9/24/2010. Requested clarification on what additional information had been requested but not yet received.	
10/6/10	email	email from Teresa Seidel, MDNRE, to Patrick Kresnak, IAC Corporate Staff, and Gail Eschenberg, IAC Port Huron indicating that no additional information had been submitted in response to multiple requests, accusing the company and consultant of withholding information and demanding that production information to determine facility PTE be submitted by 10/11/2010.	
10/6/10	telephone communication	telephone conversation between Kay Bedenis, FTCH, and Tom Julien, MDNRE, regarding the PTI application, Mr. Julian requested that the electronic calculation file be submitted to the MDNRE for verification of the calculation formulas.	
10/6/10	telephone communication	Conference call between Chris Ethridge, Teresa Seidel, Rebecca Loftus, and Joyce Zhu, MDNRE, David Yanochko, FTCH and Patrick Kresnak, IAC Corporate Staff to discuss and clarify the information requested in response to Teresa Seidel email. Agreed to conduct site visit on 10/15/2010 to obtain information.	
10/8/10	email	email from Kay Bedenis, FTCH, to Tom Julien, MDNRE, providing an electronic copy of the PTE calculations submitted with the PTI application.	ATTACHMENT - 1F Additional Information Appendix to PTI Application Pkg.
10/8/10	email	email from Tom Julien, MDNRE, to Kay Bedenis, FTCH, requesting supplemental information for state VOC BACT analysis and clarification of modeling parameters used.	
10/13/10	email	email from Kay Bedenis, FTCH, to Tom Julien, MDNRE, providing information requested in 10/8/10 email including an electronic copy of the state BACT analysis and the operating cost data obtained from US Government websites.	ATTACHMENT - 1F Additional Information Appendix to PTI Application Pkg.
10/15/10	site visit	Rebecca Loftus and Joyce Zhu, MDNRE, meet with Kay Bedenis, FTCH and IAC Port Huron facility staff to discuss process parameters and obtain requested production information. MDNRE staff, IAC staff & FTCH staff discuss production processing parameters and agree to time part processing time to derive requested production values and concur on parameters to use in emission calculations.	
10/18/10	email	email from Kay Bedenis, FTCH, to Tom Julien, Rebecca Loftus and Joyce Zhu providing a summary of the process parameters that MDNRE requested be used in the calculations in the 10/15/10 site visit, and an electronic version of the emissions calculations using the MDNRE requested process parameters. Revised MDI emissions calculations reduce MDI below previous emissions estimate. VOC Emissions calculations were re-done using a safety factor for VOC material usage (to allow for manufacturing flexibility). This required an updated state VOC BACT analysis which was also included in the submittal.	ATTACHMENT - 1F Additional Information Appendix to PTI Application Pkg.

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10/27/10	email	email from Rebecca Loftus, MDNRE, to Kay Bedenis, FTCH, requesting conference call on 10/28/2010.	
10/28/10	telephone communication	conference call between MDNRE and FTCH to discuss 10/18/2010 additional information submittal and results of site visit.	
11/19/10	email	email from Kay Bedenis, FTCH, to Tom Julien, Rebecca Loftus and Joyce Zhu requesting an update to the status of the PTI review/issuance.	
11/23/10	email	email from Tom Julien, MDNRE, to Kay Bedenis, FTCH, requesting supplemental information on an additional stack for state air toxics modeling.	
11/23/10	email	email from Kay Bedenis, FTCH, to Tom Julien, MDNRE, indicating would need to check with FTCH modeling group and would reply after Thanksgiving holiday.	
12/2/10	email	email from Kay Bedenis, FTCH, to Tom Julien, MDNRE, providing the requested stack information, a modeling output for the requested stack and an updated air toxics impact table including the additional stack impacts.	ATTACHMENT - 1F Additional Information Appendix to PTI Application Pkg.
12/6/10	Notice of Violation	Notice of Violation sent from Cheryl Newton, USEPA Region V, to Dan Barr, IAC Port Huron, requesting a response to Molly DeSalle within 10 days requesting a conference.	
12/9/10	Response to Notice of Violation	telephone conversation between Patrick Kresnak, IAC Corporate Staff, Kay Bedenis, FTCH, David Yanocho, FTCH and Molly DeSalle to discuss Notice of Violation and schedule conference. Molly DeSalle asked IAC to email possible dates to her to schedule the conference, taking into consideration the upcoming holiday and plant shutdown schedule.	
12/14/10	email	Patrick Kresnak, IAC, emailed potential dates to Molly DeSalle, US EPA for week of 1/17/11. Response agreed upon conference date of 1/19/11 at US EPA Region V offices in Chicago.	
12/20/10	telephone communication	telephone conversation between Kay Bedenis, FTCH, and Tom Julien, MDNRE, inquiring about permit review status and asking if would be possible to get draft permit conditions for the company prior to their holiday shutdown (12/23/2010 - 1-3/2011). Tom Julien agreed to try to get preliminary draft conditions out before the company shuts down for the holidays.	
12/21/10	email	email from Tom Julien, MDNRE, to Kay Bedenis, FTCH, with preliminary draft permit conditions. Kay Bedenis agreed to forward to client so that they could receive prior to their scheduled plant holiday shutdown (12/23/10 - 1/3/11). Tom Julien indicated that formal comments were not required at this time and that there would be an opportunity to provide comments at the "Proposed Final" conditions stage.	
1/11/11	telephone communication	telephone conversation between Kay Bedenis, FTCH, and Tom Julien, MDNRE, providing comments on preliminary draft permit conditions. Redlined conditions emailed from Kay Bedenis, FTCH, to Tom Julien, Rebecca Loftus and Joyce Zhu, MDNRE.	